

**LTL ATTORNEYS LLP**

Enoch H. Liang (SBN 212324)  
601 Gateway Boulevard, Suite 1010  
South San Francisco, California 94080  
Tel: 650-422-2130  
Fax: 213-612-3773  
enoch.liang@ltlattorneys.com

James M. Lee (SBN 192301)  
Caleb H. Liang (Bar No. 261920)  
300 S. Grand Ave., 14th Floor  
Los Angeles, California 90071  
Tel: 213-612-8900  
Fax: 213-612-3773  
james.lee@ltlattorneys.com  
caleb.liang@ltlattorneys.com

**HUNG G. TA, ESQ. PLLC**

Hung G. Ta  
JooYun Kim  
250 Park Avenue, 7th Floor  
New York, New York 10177  
Tel: 646-453-7288  
hta@hgtlaw.com  
jooyun@hgtlaw.com

*Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**PLAINTIFFS' NOTICE OF  
WITHDRAWAL OF ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL (DKT.  
NO. 187)**

Judge: Hon. Richard Seeborg

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that, pursuant to Local Civil Rule 7-7(e), Plaintiffs Pumaro LLC and Artiom Frunze (collectively, “Plaintiffs”), by and through their undersigned attorneys, hereby withdraw their Administrative Motion to File Under Seal, filed on January 9, 2019 (Dkt. No. 187) (“Administrative Motion”). The Administrative Motion sought to file under seal certain portions of Plaintiffs’ Motion for Class Certification as well as Exhibits J, M, O, R, and W to the Declaration of Hung G. Ta in support of the Motion for Class Certification, due to defendant Dynamic Ledger Solutions, Inc.’s (“DLS”) designation of these documents as “Confidential” pursuant to the operative Protective Order. These documents were provisionally filed under seal at Dkt. Nos. 187-04, 187-16, 187-20, 187-23, 187-27, and 187-33, respectively. On January 14, 2019, defendant Kathleen Breitman filed a Declaration Pursuant to Civil Local Rule 79-5(e) in response to the Administrative Motion (Dkt. No. 190) (“Breitman Declaration”).

Subsequent to the filing of the Administrative Motion and the Breitman Declaration, the parties met and conferred. DLS agreed to re-produce all of the documents that were the subject of the Administrative Motion with appropriate redactions so as to alleviate any confidentiality concerns. These re-produced documents thus need not be filed under seal. Plaintiffs no longer intend to rely on the versions of Exhibits J, M, O, R, and W previously filed provisionally under seal at Dkt. Nos. 187-16, 187-20, 187-23, 187-27, and 187-33, respectively, and instead intend to rely on the re-produced versions of these documents. Accordingly, Plaintiffs withdraw their Administrative Motion.

Date: January 22, 2019

LTL ATTORNEYS LLP

By: /s/ Enoch H. Liang

Enoch H. Liang  
LTL ATTORNEYS LLP  
601 Gateway Boulevard, Suite 1010  
South San Francisco, California 94080  
Tel: 650-422-2130  
Fax: 213-612-3773  
enoch.liang@ltlattorneys.com

James M. Lee  
Caleb H. Liang  
LTL ATTORNEYS LLP

300 S. Grand Ave., 14<sup>th</sup> Floor  
Los Angeles, California 90071  
Tel: 213-612-8900  
Fax: 213-612-3773  
james.lee@ltlattorneys.com  
caleb.liang@ltlattorneys.com

Hung G. Ta  
JooYun Kim  
HUNG G. TA, ESQ., PLLC  
250 Park Avenue, 7th Floor  
New York, New York 10177  
Tel: 646-453-7288  
Fax: 646-453-7289  
hta@hgtlaw.com  
jooyun@hgtlaw.com

*Lead Counsel for Court-Appointed Lead  
Plaintiff and the Class*

William R. Restis  
THE RESTIS LAW FIRM, P.C.  
402 West Broadway, Suite 1520  
San Diego, CA 92101  
Tel: 619.270.8383  
william@restislaw.com

Joseph J. DePalma  
Bruce D. Greenberg  
Jeremy Nash  
LITE DEPALMA GREENBERG,  
LLC  
570 Broad Street, Suite 1201  
Newark, NJ 07102  
Tel: (973) 623-3000  
Fax: (973) 623-0858  
jdepalma@litedepalma.com  
bgreenberg@litedepalma.com  
jnash@litedepalma.com

*Additional Counsel for the Class*